

CRIMINAL COMPLAINT (Electronically Submitted)

United States District Court	DISTRICT of ARIZONA
United States of America v. Carlos Saul Gallegos AGREDA DOB: 1997; Mexican Citizen	DOCKET NO.
	MAGISTRATE'S CASE NO. 24-01500MJ

Complaint for violation of Title 18, United States Code, § 554(a)

On or about January 24, 2024, in the District of Arizona, **Carlos Saul Gallegos AGREDA** knowingly and fraudulently exported and sent from the United States, and attempted to export and send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, and received, concealed, bought, sold, and in any manner facilitated the transportation, concealment, and sale of such merchandise, article or object, that is: one (1) AR-15 rifle lower receiver, one (1) firearm stabilizing brace, and one (1) empty 5.56x45 millimeter ammunition magazine, knowing the same to be intended for exportation contrary to any law or regulation of the United States, to wit: Title 50, United States Code, Section 4819; Title 15, Code of Federal Regulations, Parts 736.2, 738, and 774; all in violation of Title 18, United States Code, Section 554(a).

BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:

On January 24, 2024, **Carlos Saul Gallegos AGREDA** attempted to exit the United States and enter the Republic of Mexico through the Mariposa Port of Entry in Nogales, Arizona. Customs and Border Protection Officers (CBPOs) were conducting outbound inspections when they stopped **Carlos Saul Gallegos AGREDA** who was the driver, sole occupant, and registered owner of a black 2019 GMC Terrain bearing Arizona license plate C8A2FJ.

AGREDA told the primary Customs and Border Protection (CBP) officer that he/**AGREDA** was traveling to Benjamin Hill, Sonora, Mexico from Tucson, Arizona to visit family. CBP officers referred **AGREDA** to secondary inspection based on **AGREDA**'s travel itinerary, which is a common smuggling route. CBP officers obtained a negative declaration from **AGREDA** regarding the transportation of firearms, ammunition, or currency in excess of \$10,000.

During the secondary inspection, CBPOs discovered a backpack concealed in the spare tire area of **AGREDA's** vehicle. CBP officers searched the backpack and discovered one (1) AR-15 rifle lower receiver, one (1) firearm-stabilizing brace, and one (1) empty 5.56x45 millimeter ammunition magazine.

In a post-*Miranda* interview, **AGREDA** admitted to knowingly and voluntarily smuggling firearms parts out of the United States into Mexico. **AGREDA** stated that he had concealed the firearms parts in the spare tire area because he was unsure if the items were legal. **AGREDA** admitted that he intended to store the firearms parts in

(BASIS OF COMPLAINT CONTINUED ON REVERSE.)

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MATERIAL WITNESSES IN RELATION TO THE CHARGE: N/A		
Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.	SIGNATURE OF COMPLAINANT Digitally signed by JOSHUA R JOSHUA R FURMAGE Date: 2024.01.25 10:08:49-07'00'	
AUTHORIZED BY AUSA Raquel Arellano ARELLANO Digitally signed by RAQUEL ARELLANO Date: 2024.01.25 09:43:41 -07'00'	OFFICIAL TITLE HSI Special Agent Joshua R. Furmage	
Sworn by telephone <u>x</u>		
SIGNATURE OF MAGISTRATE JUDGE" Luce 12. Meurlaull	DATE January 25, 2024	

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(BASIS OF COMPLAINT'S CHARGE AGAINST THE ACCUSED CONTINUED.)

Mexico and, at a future date, acquire additional firearms parts and travel to Mexico with these parts to build a functioning firearm. **AGREDA** stated that he is aware that firearms and ammunition are illegal to export from the United States into Mexico, as indicated on multiple signs visible as he approached the port of entry. **AGREDA** admitted that he does not have a license to export firearms or ammunition from the United States.

The AR-15 rifle lower receiver, weapon accessory, and magazine found in the vehicle qualify as a United States Commerce Control List items and therefore are prohibited by law for export from the United States into Mexico without a valid license.

